



# Nepotism Disclosure Review Procedure and Compliance Form

## California State University Channel Islands

### Purpose

This document establishes the process for disclosing, evaluating, and documenting employment relationships involving immediate family members. A disclosure does not automatically disqualify an applicant or prohibit employment. Human Resources or Faculty Affairs, as applicable, must complete and document the review before an offer or appointment is approved and determine whether safeguards are needed to ensure objective, fair, and equitable employment decisions.

### PART A- Disclosure

An applicant or employee must disclose an immediate family relationship with a CSU Channel Islands employee when the relationship may involve the same department, reporting structure, selection process, supervision, or employment decisions. The disclosure must be submitted as soon as the relationship is known.

|                             |                                       |
|-----------------------------|---------------------------------------|
| Applicant or employee name  | Position and recruitment number       |
| Department                  | Hiring administrator                  |
| Related university employee | Related employee title and department |
| Nature of relationship      | Date disclosed                        |

### Applicant or employee acknowledgment

The relationship identified above has been disclosed. We understand that the University will evaluate the positions, reporting relationships, and decision-making responsibilities and may establish safeguards. We agree to provide information reasonably needed for the review and to comply with the approved determination and any required safeguards.

|                                          |                                     |
|------------------------------------------|-------------------------------------|
| Applicant or employee signature and Date | Related employee signature and Date |
|------------------------------------------|-------------------------------------|

### Review Procedure

1. The recipient promptly sends the disclosure to Human Resources for staff and MPP recruitments or Faculty Affairs for faculty recruitments. The related employee must not participate in the review.
2. The reviewing office and appropriate administrator assess the relationship, positions, reporting structure, prior involvement in the selection process, authority over employment decisions, operational need, reasonable alternatives, and any actual or perceived conflict or appearance of favoritism.
3. Before an offer or appointment is approved, the reviewing office documents whether to proceed without safeguards, proceed with safeguards, modify the reporting or decision-making structure, or not proceed when the conflict cannot be reasonably managed.
4. Document and monitor. Part B records the factors considered, reasons, determination, safeguards, designated officials, approvals, and review trigger. The appropriate administrator monitors compliance and refers reported concerns about favoritism or conflicts to Human Resources or Faculty Affairs for review and documentation.

## **Part B- University Review and Determination**

Human Resources or Faculty Affairs completes this section before an offer or appointment is approved.

### **Factors considered**

- ☐ Related employee participated in or could influence the recruitment or selection process
- ☐ Direct or indirect reporting relationship or same chain of command
- ☐ Authority or influence over supervision, assignments, schedule, leave, evaluation, compensation, promotion, discipline, termination, or other employment decisions
- ☐ Access to confidential information affecting the other person
- ☐ Actual or perceived conflict of interest or appearance of favoritism
- ☐ Reasonable alternate reporting or decision-making arrangement is available

Relevant facts and analysis:

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### **Determination**

- ☐ Proceed without safeguards because no material conflict was identified
- ☐ Proceed with the safeguards stated below
- ☐ Modify the reporting or decision-making structure before proceeding
- ☐ Do not proceed because the conflict cannot be reasonably managed

### **Safeguards when required**

- ☐ Recusal from recruitment, selection, or employment decisions
- ☐ Alternate supervisor or decision maker
- ☐ Independent review or second-level approval
- ☐ Revised reporting relationship or work assignment
- ☐ Restricted access to confidential information or systems
- ☐ Other safeguard described below

Safeguards, responsible official, effective date, and review trigger:

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### **Approval and records**

By signing, the parties acknowledge the determination and agree to follow the approved safeguards. The related employee will not participate in decisions from which they are recused. Changes or concerns must be reported promptly to Human Resources or Faculty Affairs.

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|-------------------------------------------|------------------------------------------------------|
| Hiring administrator's signature and date | Human Resources or Faculty Affairs approval and date |
| Alternate decision maker (if applicable)  | Next review date or review trigger                   |

Human Resources or Faculty Affairs will retain the disclosure, assessment, determination, safeguards, approvals, and supporting documentation with the recruitment or appointment record. If the applicant is appointed, a copy will also be retained in the appropriate personnel file.